

United States District Court
Eastern District of Washington

FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

DEC 13 2024

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON

Leland Owens

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

AEW

Daniel Bryanson

(In the space above enter the full name(s) of the defendant(s).

If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section I. Do not include addresses here.)

1:24-cv-03205-TOR

Case No. _____
(To be filled out by Clerk's
Office only)

COMPLAINT

Jury Demand?

☐ Yes

☐ No

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

I. PARTIES IN THIS COMPLAINT**Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:

Detonator Owens, Leland H

Name (Last, First, MI)

408 Skow Street

Street Address

Yakima, Wapato

County, City

WA

State

98951
~~98902~~

Zip Code

509-759-9799

Telephone Number

Defendant(s)

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1:

All Elite Wrestling

Name (Last, First)

1 Everbank Stadium Drive

Street Address

Jacksonville

County, City

FL

State

32202

Zip Code

Defendant 2:

Bryanston, Daniel

Name (Last, First)

Unknown

Street Address

County, City

State

Zip Code

Defendant(s) Continued

Defendant 3:

Name (Last, First)

Street Address

County, City

State

Zip Code

Defendant 4:

Name (Last, First)

Street Address

County, City

State

Zip Code

II. BASIS FOR JURISDICTION

Check the option that best describes the basis for jurisdiction in your case:

☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.

☒ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.

☐ **Federal Question:** Claim arises under the Constitution, laws, or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

III. VENUE

This court can hear cases arising out of the Eastern District of Washington.

Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.

Venue is appropriate in this Court because:

I live in this district

IV. STATEMENT OF CLAIM

Place(s) of
occurrence:

408 SLOW street, WALETO, WA 98551

Date(s) of occurrence: _____

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.

FACTS:

Intellectual Property Infringement

Unpaid wages for all my ideas.

What
happened to
you?

Was
anyone
else
involved?

Mercedes Varnado

Vince McMahon

I Leland Henry Owens gave ideas to Daniel
& He took some to AEW. I never got
credit.

Who did
what?

"Shockwave" was going to be an "Engage"
PPV or "PLE"

V. INJURIES

If you sustained injuries related to the events alleged above, describe them here.

Emotional Stress

VI. RELIEF

The relief I want the court to order is:

☐ Money damages in the amount of: \$ _____

☒ Other (explain):

A Reasonable offer of The Rights to
All my Ideas.

VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

12-6-24
Dated

Leland Owens
Plaintiff's Signature

Owens, Leland, H
Printed Name (Last, First, MI)

408 S Low Street
Address

Wapato
City

WA
State

98951
Zip Code

509-759-9799
Telephone Number

List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.